

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

# UNITED STATES OF AMERICA

EDWARD CONSTANTINESCU,  
PERRY "PJ" MATLOCK,  
JOHN RYBACZYK,  
GARY DEEL,  
STEFAN HRVATIN,  
TOM COOPERMAN,  
MITCHELL HENNESSEY, and  
DANIEL KNIGHT

**CRIMINAL NO. 4:22-CR-612**

## **NOTICE OF APPEAL**

Under the authority of 18 U.S.C. § 3731, the United States of America appeals to the United States Court of Appeals for the Fifth Circuit from the district court's order, entered March 20, 2024, which dismissed the superseding indictment.

Respectfully submitted,

GLENN S. LEON, CHIEF  
FRAUD SECTION  
Criminal Division  
U.S. Department of Justice

s/ *Scott Armstrong*  
SCOTT ARMSTRONG  
ASSISTANT CHIEF

**JOHN J. LIOLOS  
TRIAL ATTORNEY**

Fraud Section, Criminal Division  
U.S. Department of Justice  
1400 New York Avenue, N.W.  
Washington, D.C. 20530  
Tel: (202) 514-1106

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY  
Southern District of Texas

s/ Anna E. Kalluri  
ANNA E. KALLURI

THOMAS H. CARTER, III  
ASSISTANT U.S. ATTORNEYS

U.S. Attorney's Office  
Southern District of Texas  
1000 Louisiana, Ste. 2300  
Houston, TX 77002  
Tel: (713) 567-9706

**CERTIFICATE OF SERVICE**

I hereby certify that, on April 4, 2024, I electronically filed the foregoing Notice of Appeal with the Clerk of the Court using the ECF/CM system for filing and service on all counsel of record.

*s/ Anna E. Kalluri*  
ANNA E. KALLURI  
ASSISTANT U.S. ATTORNEY  
SOUTHERN DISTRICT OF TEXAS